

WEST MOJAVE ROUTE NETWORK PROJECT

Scoping Report



**U.S. Department of the Interior
Bureau of Land Management**

**California Desert District Office
22835 Calle San Juan De Los Lagos
Moreno Valley, CA 92553**

June 2012

This page intentionally left blank.

TABLE OF CONTENTS

1.0	Introduction	1
1.1	Purpose and Need for the West Mojave Route Network Project	5
1.2	Planning Criteria.....	5
2.0	Scoping Process	6
2.1	Purpose of Public and Agency Scoping	6
2.2	Scoping Framework and Agency Consultation	6
2.3	Purpose of Scoping Report.....	7
2.4	Notification and Scoping Meeting Advertisements	7
2.5	Scoping Meetings.....	7
3.0	Scoping Comments	10
3.1	Comment Document Collection.....	10
3.2	Comment Document Submissions by Affiliation	10
3.3	Comment Summary	11
3.3.1	Comment Submittals by Comment Category.....	13
3.3.2	Summary of Comments	15
3.3.3	Summary of Out of Scope Comments	26
4.0	Issues Identified During Scoping	27
5.0	Summary of Future Steps in the Process	32

LIST OF TABLES

Table 1.	West Mojave Project Travel Management Areas.....	2
Table 2.	Scoping Meeting Locations.....	9
Table 3.	Submission Method of Comment Documents	10
Table 4.	Number of Comment Documents Received by Affiliation	10
Table 5.	Comment Categories	12
Table 6.	Number of Comments Received by Comment Category.....	14

LIST OF FIGURES

Figure 1.	Number of Comments by Comment Category	15
-----------	--	----

MAPS

Map 1. West Mojave Planning Area 3

Map 2. Travel Management Areas in the West Mojave Planning Area..... 4

APPENDICES

Appendix A Scoping Notification A-1

Appendix B Scoping Meeting MaterialsB-1

Appendix C Scoping CommentsC-1

ACRONYMS AND ABBREVIATIONS

ACEC	Area of Critical Environmental Concern
BLM	Bureau of Land Management
CAPA	Collaborative Access Planning Area
CDCA	California Desert Conservation Area
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DAC	Desert Advisory Council
EA	Environmental Assessment
EIS	Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
GIS	Geographic Information System
NEPA	National Environmental Policy Act
NOA	Notice of Availability
NOI	Notice of Intent
OHV	Off-highway Vehicle
ROD	Record of Decision
TMA	Travel Management Area
U.S.	United States
WEMO	West Mojave
WRNPS	West Mojave Route Network Project Subgroup

This page intentionally left blank.

1.0 INTRODUCTION

In compliance with the National Environmental Policy Act of 1969 (NEPA), as amended, and the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, the Bureau of Land Management (BLM) California Desert District intends to prepare an Environmental Impact Statement (EIS) to amend the West Mojave (WEMO) Plan and the Motorized Vehicle Access Element of the California Desert Conservation Area (CDCA) Plan (referred to as the WEMO Route Network Project [Project]). This document summarizes the issues identified during the Project's scoping period.

The WEMO Project planning area includes over 3.2 million acres of public lands administered by the BLM, California Desert District, in the western portion of the Mojave Desert in southern California. The area is part of the CDCA, which was created by Congress with the passage of the FLPMA, and is managed according to the 1980 CDCA Plan. The WEMO Project planning area is located northeast of the Los Angeles metropolitan area and covers portions of Los Angeles, Inyo, Kern and San Bernardino Counties (Map 1). The northwestern portion is under the jurisdiction of the BLM's Ridgecrest Field Office, while the BLM's Barstow Field Office administers most of the remainder. The BLM's Needles and Palm Springs Field Offices administer very small acreages within the WEMO Project planning area.

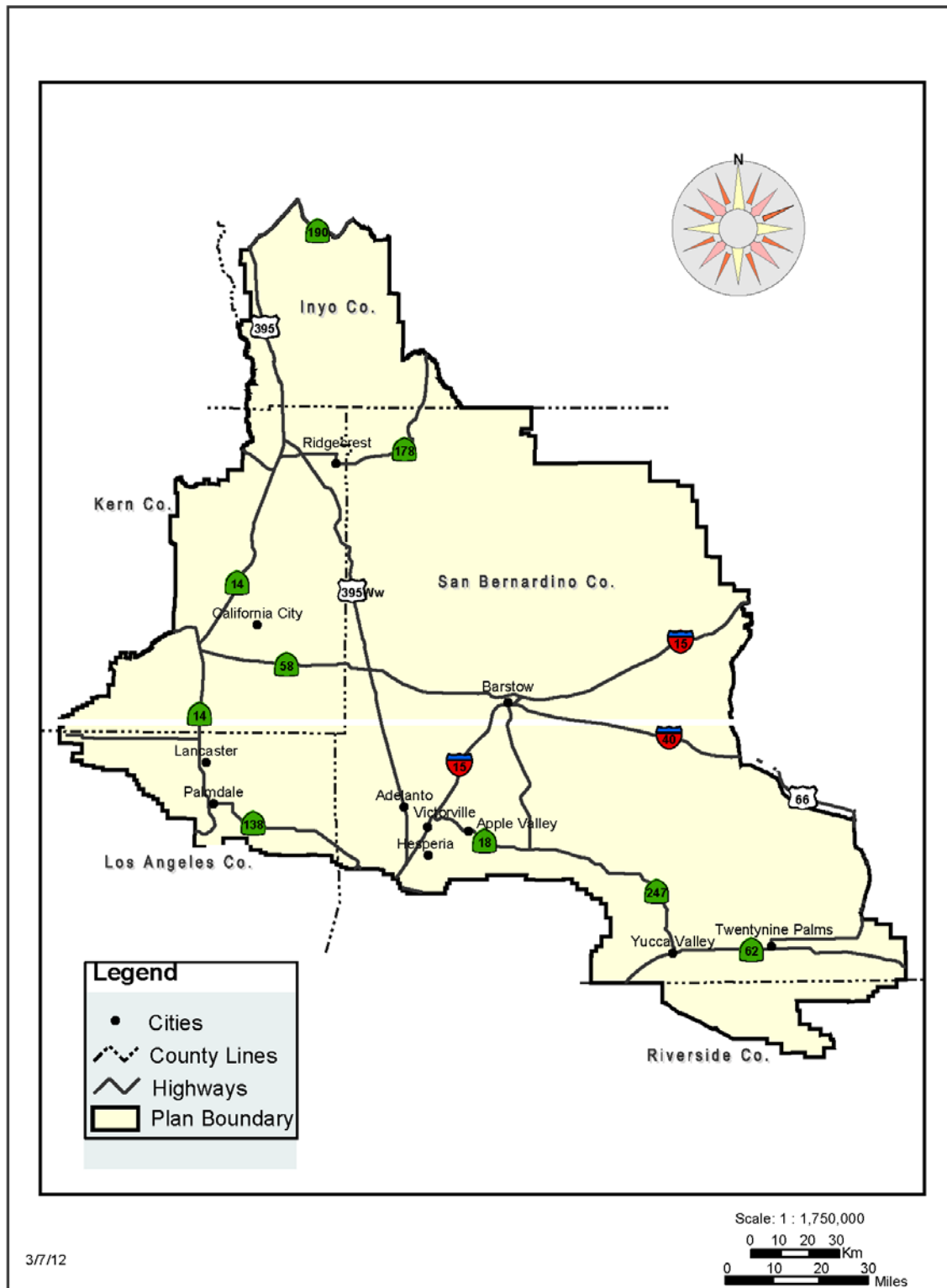
The 1980 CDCA Plan included 12 plan elements for managing over 25 million acres of public land resources and resource uses in southern California, including a Motorized Vehicle Access Element. The Motorized Vehicle Access Element identified management guidelines and objectives for access and vehicular use in the CDCA. Amended numerous times after adopted, BLM approved a comprehensive amendment to the 1980 CDCA Plan in 2006. The 2006 WEMO Record of Decision (ROD) approved the amendment modifying the motorized vehicle management decisions in the WEMO planning area of the CDCA, designating 5,098 miles of motorized vehicle routes without changing the language in the 1980 CDCA Plan. The CDCA Plan contains language that has been judicially determined to restrict motorized routes to those that existed in 1980. A lawsuit challenged the 2006 WEMO ROD's route designation process and in January 2011, the U.S. District Court for the Northern District of California remanded in part the 2006 WEMO ROD to the BLM. The Court directed BLM to amend the CDCA Plan and revise its decision on route designation in the WEMO area by March 13, 2014.

The WEMO Project will look at alternatives for amending the Motorized Vehicle Access Element of the CDCA Plan and alternative processes for route designation in eight Travel Management Areas (TMAs). Updated language in the Motorized Vehicle Access Element will more clearly describe management of motorized vehicle use in the planning area. Ultimately, the BLM will develop an EIS to amend the CDCA Plan and eight travel management plans for each of the TMAs, which will address the travel needs for all resource management programs on BLM-administered land. Table 1 lists the subregions and identifies the general location of the eight TMAs (Map 2) that will be addressed in this effort.

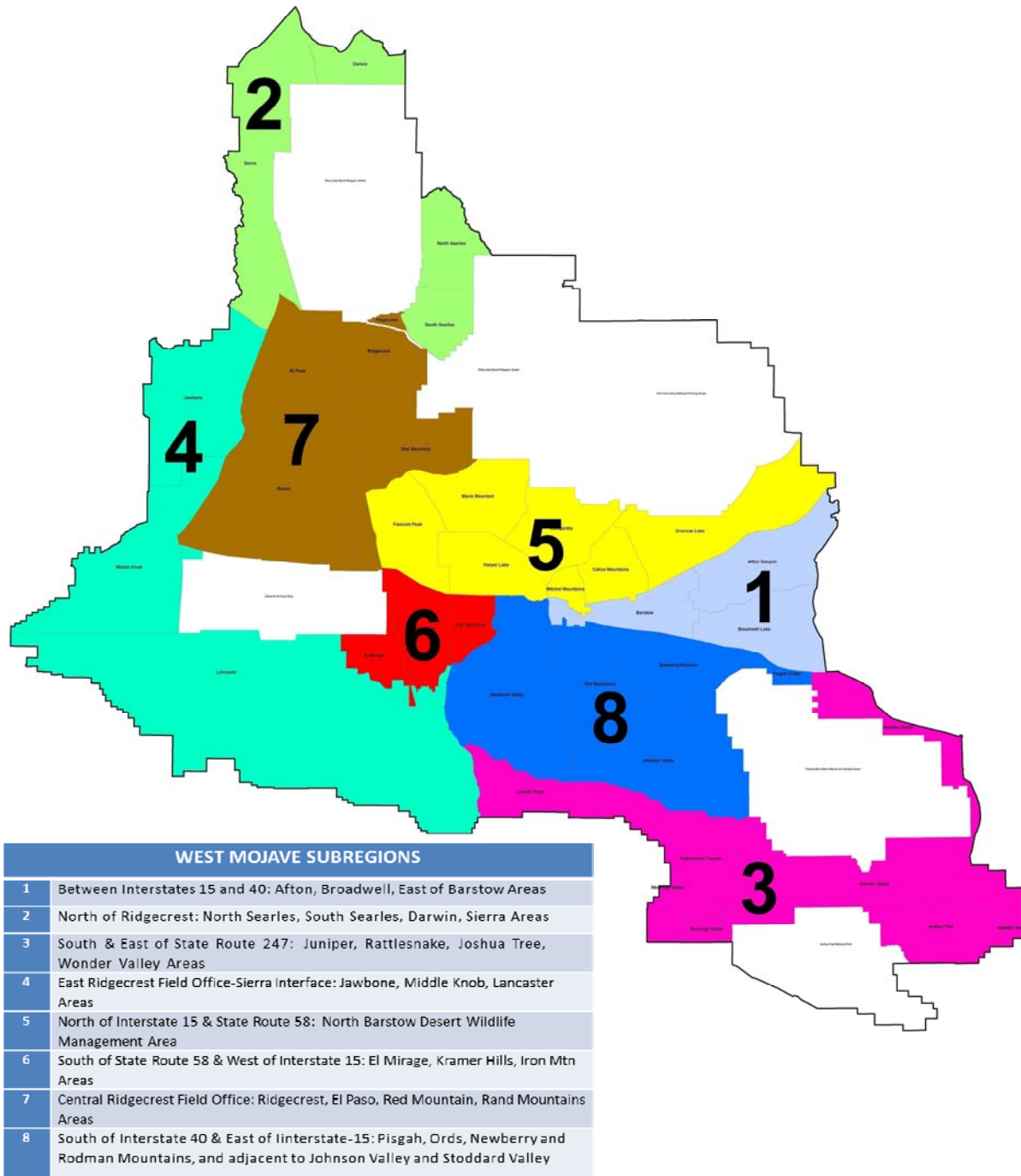
Table 1. West Mojave Project Travel Management Areas

Travel Management Area	Subregions and General Location
1	Broadwell Lake, Afton Canyon, and East of Barstow signing subregions
2	Sierras, Darwin, and North and South Searles signing sub-regions
3	Juniper, Rattlesnake, Morongo, Wonder Valley, and Joshua Tree signing sub-regions
4	Jawbone, Middle Knob and Lancaster signing sub-regions
5	West Mojave North Barstow Desert Wildlife Management Area signing sub-region north of Interstate-15 and State Route 58
6	Mirage (including Edwards Bowl area), Fremont, and Iron Mountain signing sub-regions south of State Route 58
7	Ridgecrest, El Paso, Rands and Red Mountain signing sub-regions
8	Lands adjacent to Stoddard and Johnson Off-highway Vehicle areas, and other signing sub-regions south of Interstate-40 and north of State Route 247 including east of Interstate-15

Map 1. West Mojave Planning Area



Map 2. Travel Management Areas in the West Mojave Planning Area



1.1 Purpose and Need for the West Mojave Route Network Project

The purpose of the WEMO Project is to amend the WEMO Plan and the Motorized Vehicle Access Element of the CDCA, pursuant to the 2011 Court Order remanding portions of the 2006 WEMO ROD. The WEMO Project EIS will form the framework for route designation in the WEMO Project planning area, consistent with the rest of the WEMO Plan. The plan amendment will address inconsistencies in the language between the CDCA and the WEMO Plan that was one of the subjects of the Court Order. In addition, the BLM is preparing eight travel management plans to designate specific routes in various portions of the WEMO Project planning area and implement the route network.

1.2 Planning Criteria

The BLM identified the following preliminary planning criteria that will help guide the development of the alternatives and NEPA analysis. The planning criteria take into consideration applicable law, regulation, and policy, and will apply throughout the planning process.

- The plan amendment will comply with FLPMA, NEPA, and all other applicable laws, regulations, and policies.
- For program-specific guidance for decisions at the land use planning level, the process will follow the BLM's policies in the Land Use Planning Handbook, H-1601-1 and Manual Section 1626, Travel and Transportation Management.
- Public participation and collaboration will be an integral part of the planning process.
- The BLM will strive to make decisions in the plan compatible with the existing plans and policies of adjacent local, State, and Federal agencies and local American Indian Tribes, as long as the decisions are consistent with the purposes, policies, and programs of Federal law and regulations applicable to public lands.
- The plan amendment will incorporate, where applicable and appropriate, management decisions brought forward from existing planning documents.
- The BLM will work collaboratively with Cooperating Agencies and all other interested groups, agencies, and individuals.
- Geographic Information System (GIS) and metadata information will meet Federal Geographic Data Committee standards, as required by Executive Order 12906. All other applicable BLM data standards will also be followed.
- The planning process will provide for ongoing consultation with American Indian Tribes and strategies for protecting recognized traditional uses, e.g., gathering of traditionally used plant materials.
- The plan amendment will focus on developing language for the WEMO Project planning area that conforms to the goals of the Motorized Vehicle Access Element of the CDCA Plan as described in the 1982 Plan Amendment #3.

2.0 SCOPING PROCESS

Scoping is required under NEPA as defined in Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations [CFR] 1500–1508). The BLM NEPA Handbook (H-1790-1) and the BLM Land Use Planning Handbook (H-1601-1) provide additional guidance and direction on scoping as part of the NEPA and planning process.

2.1 Purpose of Public and Agency Scoping

Scoping provides an early and open process for determining the scope of issues an agency will address in a NEPA environmental document. Scoping is the process used to solicit internal and external input and comments on the issues, impacts, and potential alternatives the agency will address in the environmental document and the extent to which the agency will analyze those impacts.

2.2 Scoping Framework and Agency Consultation

In addition to the public input received through the NEPA scoping process described in this scoping report, the BLM is coordinating and receiving input on the WEMO Project from Cooperating Agencies, Tribal governments, and the California Desert District Advisory Council (DAC).

Prior to the start of the scoping period, the BLM mailed 51 Cooperating Agency invitation letters to federal, state, and local agencies identified as having special expertise or jurisdiction by law applicable to the WEMO Project. The letters notified potential Cooperating Agencies of the WEMO Project, provided an overview of the WEMO Project, invited participation as a Cooperating Agency, and provided contact information to submit questions.

The BLM also mailed 16 Tribal consultation letters to potentially affected Tribes formally initiating government-to-government consultation regarding the WEMO Project. The Tribal consultation letters provided an overview of the WEMO Project; requested consultation and invited input; and provided contact information to submit any questions, concerns, or comments on the WEMO Project.

The DAC is a citizen-based Resource Advisory Council that provides recommendations on the management of public lands in the BLM's California Desert District. The DAC operates under a Charter established under Section 309 and Section 601 (g)(1) of the FLPMA, as amended (43 U.S. Code 1739); and all other provisions of the law. In December 2011, in response to the WEMO Project, the DAC established the WEMO Route Network Project Subgroup (WRNPS), which provides input regarding route-specific and network issues pertinent to the WEMO planning area for BLM to consider. The WRNPS is composed of members representing industry, recreation, conservation and the public at large and holds regularly scheduled meetings that are open to the public. The mission of the WRNPS is to prepare a report identifying and providing supporting documentation for a range of alternatives for the eight TMAs in the planning area. The WRNPS is scheduled to submit its final report to the BLM in April 2013.

The BLM will continue to coordinate with the public, Cooperating Agencies, Tribal governments and the DAC throughout the WEMO Project. While this report only considers comments submitted through the formal NEPA scoping process, the Draft EIS will address the input received from all sources.

2.3 Purpose of Scoping Report

This scoping report describes scoping activities for the WEMO Project, summarizes public and agency comments received during scoping, describes the analysis of those comments, summarizes comments by comment category, and provides a preliminary list of issues, concerns, and opportunities for analysis in the EIS. During the EIS preparation, the BLM will consider all substantive issues raised by commenters that are within the scope of BLM decisions.

2.4 Notification and Scoping Meeting Advertisements

The formal scoping process began with publication of the Notice of Intent (NOI) in the *Federal Register* on September 13, 2011 (Appendix A). The original WEMO Project scoping period, as identified in the NOI, ran from September 13, 2011 to October 13, 2011, which the BLM later extended to April 16, 2012. All comments received or postmarked by April 16, 2012 were included in this scoping report. The NOI notified the public of the BLM's intent to prepare an environmental document for the WEMO Project, provided information on the proposed action, described the purpose of the scoping process, and identified methods to provide comments.

As part of the scoping process, the BLM hosted scoping meetings and public workshops for the public and other interested parties to learn about and submit comments on the WEMO Project (see Section 2.5). The BLM advertised the scoping meetings using a variety of outreach materials including the Project website and news releases (Appendix A). The outreach materials provided an overview of the proposed project; provided meeting locations, dates, and times; explained the purpose of the scoping meetings; identified methods for making comments; and provided contact information for questions regarding the WEMO Project. All materials provided an e-mail address for submitting comments (cawemopa@blm.gov) and a link to the Project website (http://www.blm.gov/ca/st/en/fo/cdd/west_mojave_wemo.html) which contained a comment form and additional project background information.

In the scoping announcements, the BLM requested public comments regarding:

1. Issues related to plan decisions which will guide the management of motorized vehicle access in the WEMO Project planning area;
2. Process and decision criteria to be used during plan implementation to designate routes;
3. Issues and concerns within each subregion;
4. Additional issues cited by the January 28, 2011 Court Order including special status species, vegetation communities (including unique plant assemblages), special area designations, air quality, cultural resources, soils, springs and seeps, and Mojave fringe-toed lizard habitat; and,
5. The "bundling of analysis areas" for route designation.

2.5 Scoping Meetings

The BLM held 10 public scoping meetings to initiate the BLM's process for reconsidering motorized vehicle route designations in the WEMO Project planning area. The BLM held two overview open house public meetings September 27 and 29, 2011, in Ridgecrest and Barstow, California, and based on scoping comments and feedback from those meetings, followed with eight public travel designation workshops, also held in Ridgecrest and Barstow, in January and February 2012. A total of 299 people, not including BLM staff, attended the scoping meetings and workshops. Prior to the meetings, the BLM posted WEMO current maps and additional project information to the Project website for public review. Table 2 provides the locations, dates, times, and number of attendees at each scoping meeting.

All public meetings and workshops consisted of a presentation, followed by a facilitated discussion and open-house format where attendees could meet with BLM managers and specialists in an informal setting to ask questions and learn more about the Project. A brief description of the meeting materials and format for the public meetings and travel designation workshops follows. Appendix B includes copies of scoping meeting materials.

Public Meetings

The September 2011 public meetings began with an informational presentation on the designation process and provided examples of how to provide useful feedback to the BLM during the scoping process. These EIS scoping meetings provided the public the opportunity to provide input on planning issues and the route designation process and overall issues. Following the presentation, attendees were encouraged to circulate through each of the five stations around the meeting room that included posters, route network overview maps, and BLM staff available to provide information, answer questions, and gather feedback from attendees on the route designation approach, alternatives, and minimization considerations. The BLM provided handouts of 14 different maps (11"x17") showing various portions of the currently available and signed route network in the WEMO planning area and posted them on the Project website for examination in more detail. At each meeting, the BLM provided attendees with comment forms and a BLM staff person was available to capture verbal comments.

Travel Designation Workshops

Each of the eight travel designation workshops focused on a particular TMA and provided the public an opportunity to review maps and emphasized providing route- and location-specific comments to the BLM on the focus TMA. The BLM collected additional comments on the overall process as well as other TMAs. The workshops began with a presentation that provided an overview of the route designation process and described the type of general and site-specific information the BLM was looking for from public comments. Each meeting had three to seven stations set up around the room for geographic areas within the TMA that was the focus of that evening's workshop. Each station, in turn, had three to seven large overview maps and an average of twice as many detailed route network maps showing open and closed routes and other site-specific information. Approximately 100 maps (35 overview maps and 65 detailed route network maps) covering the WEMO planning area were provided at all eight workshops. The BLM provided all maps in large format (33"x44") for display at the stations and printed several copies of each in smaller format (11"x17") for handout. The BLM posted maps to the Project website for examination in detail. The BLM provided comment forms to capture general and site-specific comments and transcribed verbal comments at each workshop. In addition, a BLM GIS specialist attended to provide detailed spatial information that is being used to update maps, and capture locational-specific comments.

Table 2. Scoping Meeting Locations

Date	Location	Type	Number of Attendees
September 27, 2011 6:30 p.m. – 9:30 p.m.	Kerr McGee Center 100 W. California Avenue Ridgecrest, California	Public Meeting	40
September 29, 2011 6:30 p.m. – 9:30 p.m.	Hampton Inn 2710 Lenwood Road Barstow, California	Public Meeting	44
January 9, 2012 4:00 p.m. – 7:00 p.m.	Barstow Field Office 2601 Barstow Road Barstow, California	Travel Designation Workshop – Travel Management Area 1	19
January 18, 2012 4:00 p.m. – 7:00 p.m.	Kerr-McGee Building 100 West California Avenue Ridgecrest, California	Travel Designation Workshop – Travel Management Area 2	30
January 26, 2012 4:00 p.m. – 7:00 p.m.	Barstow Field Office 2601 Barstow Road Barstow, California	Travel Designation Workshop – Travel Management Area 3	24
February 6, 2012 4:00 p.m. – 7:00 p.m.	Kerr-McGee Building 100 West California Avenue Ridgecrest, California	Travel Designation Workshop – Travel Management Area 4	44
February 9, 2012 4:00 p.m. – 7:00 p.m.	Barstow Field Office 2601 Barstow Road Barstow, California	Travel Designation Workshop – Travel Management Area 5	16
February 14, 2012 4:00 p.m. – 7:00 p.m.	Barstow Field Office 2601 Barstow Road Barstow, California	Travel Designation Workshop – Travel Management Area 6	7
February 16, 2012 4:00 p.m. – 7:00 p.m.	Kerr-McGee Building 100 West California Avenue Ridgecrest, California	Travel Designation Workshop – Travel Management Area 7	54
February 21, 2012 4:00 p.m. – 7:00 p.m.	Barstow Field Office 2601 Barstow Road Barstow, California	Travel Designation Workshop – Travel Management Area 8	21

3.0 SCOPING COMMENTS

3.1 Comment Document Collection

The BLM received 297 written comment documents collected at public meetings or sent to the BLM via standard mail or e-mail during the scoping period (Table 3). The BLM accepted comments in any written format including verbal comments transcribed during the 10 scoping meetings (see Section 2.5). Of the 297 comments received, 27 were submitted through some variety of form letter. Form letters are standardized and duplicated letters that contain the same text or portions of text and comments. The BLM read all form letters in their entirety and extracted and analyzed any comments unique and supplemental to the form letter; however, the BLM considered comments with the same text as one comment. Section 3.3.1 describes the number of individual comments.

Table 3. Submission Method of Comment Documents

Submission Method	Number of Comment Documents
E-mail	116
Scoping Meeting	127
Standard Mail	54
Total Comment Documents Received During Scoping	297

3.2 Comment Document Submissions by Affiliation

Most comment documents were submitted by commenters with no identified affiliation, such as recreation enthusiasts, and other members of the public (Table 4). Interest groups submitted the second greatest number of comments followed by businesses.

Table 4. Number of Comment Documents Received by Affiliation

Commenter Affiliation	Number of Comment Documents
No Affiliation Indicated	201
Business	4
Interest Group	84
State Agency	3
County or City Government	2
Federal Agency	3
Total	297

3.3 Comment Summary

The BLM used a multi-step process to catalogue, organize, sort, and summarize comments submitted during scoping. The following nine steps describe how the BLM processed comment documents, identified and bracketed individual comments, and grouped comments into comment categories:

1. Receive and log data for each comment document (e.g., date received, entity, affiliation).
2. Assign each comment document a unique identifier (referred to as a document number) for tracking purposes.
3. Electronically scan the comment document.
4. Review the comment documents and identify (bracket) each individual comment in the comment documents. Many comment documents include multiple individual comments.
5. Code each comment with a comment category (i.e., broad topics used to group comments expressing similar concerns) based on the content of the comment.
6. Enter all individual comments into a sortable spreadsheet with applicable fields, including comment text, comment category, and other relevant information.
7. Sort comments by comment category.
8. Summarize comments by comment category in a narrative form to describe the general questions and concerns submitted during scoping.
9. Develop issue statements to identify questions, concerns, and opportunities submitted during scoping to provide a framework for addressing scoping issues in the EIS.

The BLM categorized all comments into comment categories that reflect common concerns and themes expressed by commenters. Comments submitted on the WEMO Project generally fell into categories of NEPA, livestock grazing, route designation process and issues, and out of scope. Comments regarding route designation were either general (related to the entire route network or multiple routes) or site-specific (associated with a particular TMA). In general, commenters expressed the same issues about specific routes as they expressed about the route network as a whole, and vice versa. Table 5 displays the comment categories identified in this scoping report.

Table 5. Comment Categories

Comment Categories	
1.	NEPA Process
2.	Livestock Grazing
3.	Route Designation Process
<i>General and Network Wide Route Designation</i>	
4.	43 CFR 8342.1(a) – Route Designation Criterion A
5.	43 CFR 8342.1(b) – Route Designation Criterion B
6.	43 CFR 8342.1(c) – Route Designation Criterion C
7.	43 CFR 8342.1(d) – Route Designation Criterion D
8.	Network Purpose and Need
9.	Range of Alternatives
10.	Data and Route Inventory
11.	Analysis and Impacts
12.	Mitigation and Minimization
13.	Implementation and Administrative Actions
<i>Route-Specific Designation</i>	
14.	Travel Management Area 1
15.	Travel Management Area 2
16.	Travel Management Area 3
17.	Travel Management Area 4
18.	Travel Management Area 5
19.	Travel Management Area 6
20.	Travel Management Area 7
21.	Travel Management Area 8
Out of Scope	

CFR Code of Federal Regulations
 NEPA National Environmental Policy Act

Categories 4-7 refer to the minimization criteria (43 CFR 8342.1) the BLM must consider during route designation. The 2011 Court Order requires the BLM to reconsider the off-highway vehicle (OHV) route designation for the WEMO Plan that complies with FLPMA and the minimization criteria (43 CFR 8342.1), reproduced below.

All designations shall be based on the protection of the resources of the public lands, the promotion of the safety of all the users of the public lands, and the minimization of conflicts among various uses of the public lands; and in accordance with the following criteria:

(A) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.

(B) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.

(C) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.

(D) Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that off-road vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established. (43 CFR 8342.1)

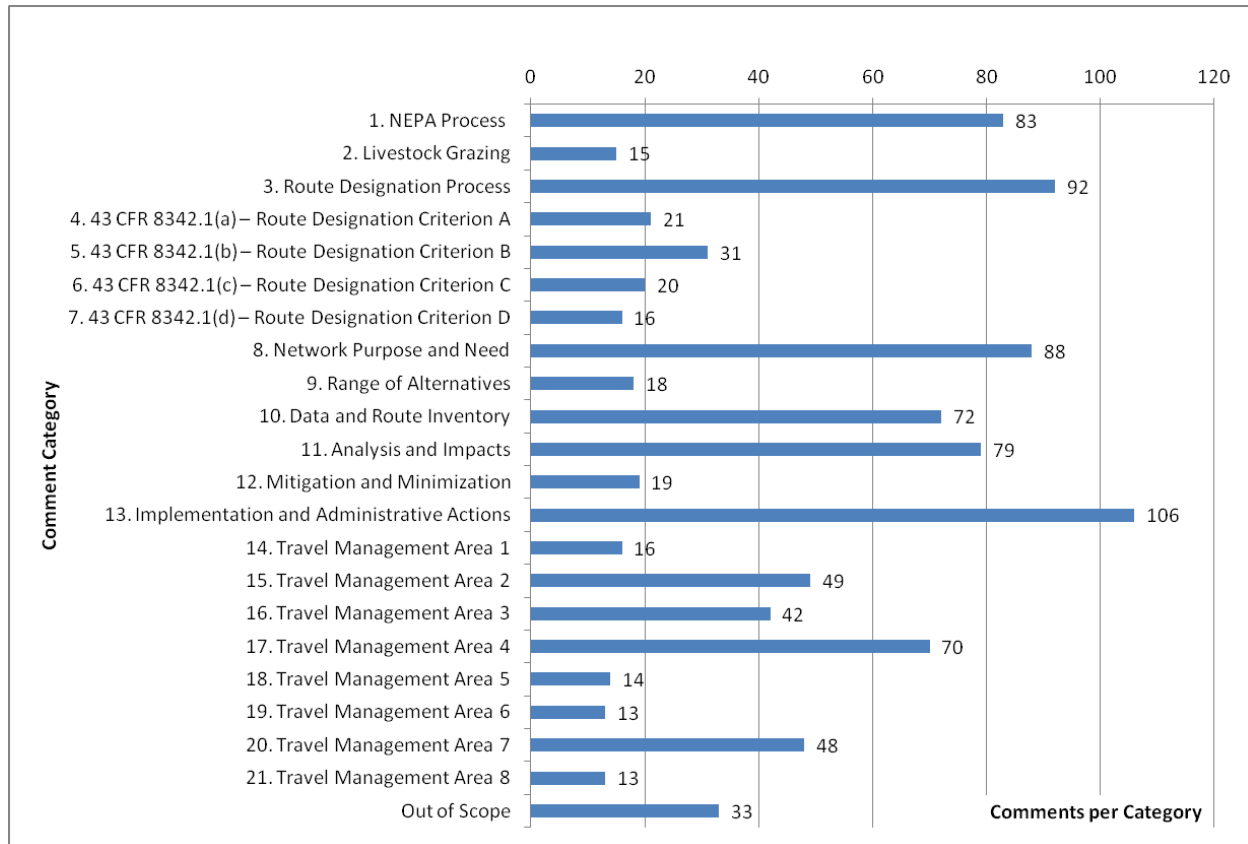
3.3.1 Comment Submittals by Comment Category

The BLM identified 958 individual scoping comments covering a broad range of comment categories. Table 6 and Figure 1 summarize the number of scoping comments identified by comment category. The greatest number of comments within the scope of the EIS were associated with implementation and administrative actions (106), route designation process (92), network purpose and need (88), and NEPA process (83). Out of scope comments (33) included comment period extension requests, comments regarding need for specific BLM staff, concerns about cost, and other comments that were not within the scope of analysis for the WEMO Project. Appendix C includes all individual comments organized by category.

Table 6. Number of Comments Received by Comment Category

Comment Categories	Number
1. NEPA Process	83
2. Livestock Grazing	15
3. Route Designation Process	92
<i>General and Network Wide Route Designation</i>	
4. 43 CFR 8342.1(a) – Route Designation Criterion A	21
5. 43 CFR 8342.1(b) – Route Designation Criterion B	31
6. 43 CFR 8342.1(c) – Route Designation Criterion C	20
7. 43 CFR 8342.1(d) – Route Designation Criterion D	16
8. Network Purpose and Need	88
9. Range of Alternatives	18
10. Data and Route Inventory	72
11. Analysis and Impacts	79
12. Mitigation and Minimization	19
13. Implementation and Administrative Actions	106
<i>Route-Specific Designation</i>	
14. Travel Management Area 1	16
15. Travel Management Area 2	49
16. Travel Management Area 3	42
17. Travel Management Area 4	70
18. Travel Management Area 5	14
19. Travel Management Area 6	13
20. Travel Management Area 7	48
21. Travel Management Area 8	13
Out of Scope	33
Total Comments Identified	958

CFR Code of Federal Regulations
NEPA National Environmental Policy Act

Figure 1. Number of Comments by Comment Category

CFR Code of Federal Regulations
 NEPA National Environmental Policy Act

3.3.2 Summary of Comments

This section summarizes comments submitted during scoping that are within the scope of the WEMO Project. The BLM grouped comment summaries into comment categories based on the content of the comment.

Category #1 – National Environmental Policy Act Process

Commenters raised several issues related to the NEPA process, including the type of environmental document to be prepared for the WEMO Project, public participation, and the scoping process. Many commenters noted there was a need to prepare an EIS to adequately address impacts on sensitive resources (e.g., special status species, historic resources, etc.), physical resources (e.g., air quality, soils, water), and cumulative impacts. Other commenters indicated additional stakeholder and agency coordination was needed to ensure consistency with local plans and policies including RS 2477 rights-of-way. Commenters also suggested the BLM more clearly define the scope and proposed actions including the relationship to the previous WEMO Plan.

Commenters emphasized public participation suggesting that the BLM hold regular public meetings during the NEPA and route designation process, allow early and adequate opportunity for public and agency comment, consider all public comments, involve private landowners, and implement a robust stakeholder

process involving a wide range of citizens and interest groups. Some commenters urged caution regarding the voices on the extreme ends of the WEMO Project and asked the BLM to facilitate a safe and harassment-free dialogue.

Commenters also submitted several comments regarding the WEMO Project scoping process. Several commenters expressed concern that the scoping meetings and workshops were flawed and did not meet NEPA scoping guidelines, including inappropriately limiting the scope of what will be accepted and considered as comments. Commenters indicated more site-specific scoping meetings were required for each sub-region given the complexity of issues involved. Some commenters also noted that the scoping meeting announcements, the timing and location of meetings, options for comment submittal, and information presented at the scoping meetings were inadequate and did not meet their needs. Many commenters found fault with the maps and GIS data supplied at the scoping meetings, indicating the maps were of inconsistent and inadequate scale, and did not include important landmarks or road names that would allow the public to make site-specific comments. One commenter requested the BLM refrain from displaying unauthorized routes on public maps as they may encourage unauthorized use.

Category #2 – Livestock Grazing

Comments received on livestock grazing raised issues associated with the analysis of livestock grazing impacts and the need to revise the grazing element of the WEMO Plan. Commenters generally requested the BLM conduct a more thorough analysis of the cumulative impacts of grazing and conduct greater site-specific analyses for each grazing allotment. Specifically, commenters requested the BLM provide a quantitative analysis of the number of routes that cross each grazing allotment and describe the associated issues of compatibility and competing uses in the EIS.

Category #3 – Route Designation Process

Many commenters expressed support or opposition to analyzing motorized vehicle use separately or combined with sub-regional route designation. Commenters fell on both sides of the issue with some commenters supporting the separate approach because of the proximity of the planning area to a large population. Some commenters noted their opposition to the combined approach, and made recommendations for evaluating subregions. Commenters expressed support for using the subregion approach, while others were in favor of the regional approach. Several commenters requested the BLM continue to conduct the route designation process in the Collaborative Access Planning Area (CAPA) (El Paso Mountains and Ridgecrest) as a separate process to allow more time for community participation. Some commenters indicated the court decision did not apply to the lands involved in the CAPA process. One commenter requested the BLM initiate a CAPA process for other areas.

Commenters made several recommendations for the BLM to consider during the route designation process. Some of the suggestions included consideration of regional connectivity, designation of roads already approved (e.g., wilderness boundary roads and cherry stems) or roads easily justified for motorized use, and borrowing from other sources or emulating related processes, such as the California Department of Motor Vehicles Division code (38026.1) which allows for combined use (OHVs and regular vehicles) on highways. Several comments emphasized the importance of key elements of the route designation process including availability of personnel to manage and maintain the route network based on affected resources and management objectives, minimizing vehicle impacts on natural resources, use of aerial photography and GIS, identification of destinations and opportunities, and collaboration with the public and stakeholders. Commenters identified coordination with other land managers, notably the U.S. Forest Service, as an important component of the route designation process. Commenters noted that a

one-size-fits-all approach is not appropriate, noting, for example, decisions applicable to open areas may not apply to limited areas.

Commenters also reminded BLM of the importance of adhering to all state and federal laws and governing land use plans necessary for a cohesive route designation process that minimizes resource impacts but addresses all multiple-use classes. Several comments reiterated the importance of considering the 43 CFR 8342.1 criteria for route designation and suggested they be used consistently.

General and Network Wide Route Designation

Category #4 – 43 CFR 8342.1(a) – Route Designation Criterion A

Criterion A under 43 CFR 8342.1 requires the BLM to minimize damage to air, soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.

Commenters emphasized the importance of considering the impacts of route designation on soil, watershed, vegetation, air, visual, cultural, and other resources on public lands. Commenters made the following suggestions or comments:

- Soil – use erosion potential ratings when evaluating vehicle use on routes in certain topographies to minimize damage to soils. Stabilize and rehabilitate closed routes as quickly as possible to minimize soil erosion.
- Watershed – avoid designating motorized routes in riparian areas and remove routes in ephemeral waterways including washes.
- Vegetation – limit motorized use to necessary routes to avoid loss of native plants. Commenters identified several sensitive species (e.g., white-margined beardtongue, Mojave monkey flower, and Lane Mountain milk-vetch) that may be affected by motor vehicle use or related activities in the planning area.
- Air – increased routes could lead to increased pollutant emissions and associated adverse impacts on human health. Commenters expressed concern that if air quality in open areas is not improved recreationists may move to other areas creating unauthorized routes.
- Visual – use the Visual Resource Management program when opening routes and prioritizing closing and rehabilitating routes.
- Cultural – erect gates to limit access to cultural sites but do not eliminate all access.

Generally, commenters emphasized that use limitations and minimization criteria were important to consider when evaluating routes for vehicle use to minimize impacts on resources, other uses, and adjacent lands.

Category #5 – 43 CFR 8342.1(b) – Route Designation Criterion B

Criterion B under 43 CFR 8342.1 requires the BLM to minimize harassment of wildlife or significant disruption of wildlife habitats.

Commenters expressed concerns that motorized vehicle use could affect wildlife, special status species, and their habitat in the planning area. Commenters cited loss of habitat, habitat fragmentation, mortality from collision, and reduced density as concerns associated with route proliferation and suggested analyses and mitigation to address the impacts. One commenter cited the 2011 *Revised Recovery Plan for the Mojave Population of the Desert Tortoise* recovery plan as a source of information regarding direct and

indirect threats from motorized vehicle use to desert tortoises and their habitats including crushing, loss of shelter, deliberate maiming or killing, air pollution, fire, invasive plants, surface disturbance, and toxicants.

Commenters specifically noted motorized vehicle use could impact the following special status species:

- Mojave desert tortoise
- Mojave ground squirrel
- Bendire's thrasher
- Gray vireo
- Le Conte's thrasher
- Mojave fringe-toed lizard
- Nelson's bighorn sheep
- Western pond turtle
- Mojave tui chub

Additionally, commenters suggested using timing restrictions to minimize effects of vehicle use on wildlife; there was a lack of data supporting closing routes to improve wildlife connectivity; and routes (motorized and non-motorized) should avoid riparian areas to minimize wildlife harassment and habitat degradation. One comment supported management actions to protect wildlife habitat and consideration of potential impacts from invasive plants, fire, and global warming on plant and animal distribution in arid lands.

Category #6 – 43 CFR 8342.1(c) – Route Designation Criterion C

Criterion C under 43 CFR 8342.1 requires the BLM to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas.

Several commenters expressed concern related to conflicts between motorized vehicle use and recreation and the compatibility of such uses with existing conditions in populated areas. Some of the specific concerns raised by commenters included the adverse effects on non-motorized recreation, access, and private property. To address the conflicts with other recreation, commenters recommended designating certain trails for hiking only and suggested motorized and non-motorized activities occur in separate areas to reduce conflicts. The BLM also received comments suggesting limitations on the types of motorized vehicle use including allowing only street legal vehicles to minimize impacts of staging areas.

Commenters raised several concerns related to adverse effects on private property from motorized vehicle use on public lands including noise, air quality, trespass and lack of law enforcement, loss of property values, and effects associated with large OHV events (environmental, property damage, accidents, and clean-up costs). Other commenters recommended eliminating routes at public-private lands interface and posting signs where routes terminate on private property to prevent trespass. Some commenters noted conflicts with routes terminating at state roads, crossing controlled access highways, and use of local roads.

Category #7 – 43 CFR 8342.1(d) – Route Designation Criterion D

Criterion D under 43 CFR 8342.1 prohibits trails to be located in officially designated wilderness areas or primitive areas.

Commenters recommended reducing or eliminating routes near or within wilderness areas, primitive areas, and areas where sensitive resources occur including Areas of Critical Environmental Concern (ACECs), Desert Wildlife Management Areas, Mojave Ground Squirrel Conservation Areas, etc.

Commenters recommended the BLM consider prohibiting motor vehicles, closing existing routes, and closing adjacent routes to prevent access to wilderness areas. Other commenters indicated routes should be allowed to terminate at wilderness area boundaries and one suggested the California Desert Protection Act took precedent over the federal criteria (43 CFR 8342.1[d]) allowing route designation adjacent to wilderness boundaries as well as exempt vehicle access. One commenter requested BLM quantify the number of routes and resource impacts (habitat, species, etc.) in sensitive areas. Another commenter emphasized the importance of using available data or tools with on-the-ground implementation in the route designation process in sensitive areas.

Category #8 – Network Purpose and Need

Comments in this category primarily addressed reasons why commenters supported or did not support aspects of the WEMO route network. Most comments emphasized the importance of route access for seniors and disabled persons, recreation opportunities including motorized and non-motorized activities such as collecting (gems, minerals, fossils, rocks), driving for pleasure, visiting historic sites, wildlife viewing, photography, horseback riding, climbing, biking, camping, mountain biking, and hiking. Commenters also provided reasons why the BLM should not diminish route access.

Many commenters requested the BLM maintain or restore access to areas special to them including “rockhounding” locations, scenic areas, and favorite OHV routes. Commenters also requested access to private property, water sources for livestock and wildlife, and for educational and research purposes including to fossil sites for paleontological study.

Route expansion was also a common theme in many of the submitted comments. Commenters indicated more trails were needed for a variety of reasons including recreation and safety, noting that dispersing users over larger areas would relieve congestion and prevent accidents. Several commenters identified the need for more types of trails such as single track routes for motorcycle or mountain bikes in order to increase the opportunities for different skill levels (e.g., motorcycle trials, technical trails, youth loops) and the range of riding experiences (single track, quad recreation).

Category #9 – Range of Alternatives

Commenters submitted several comments about the range of alternatives the BLM should consider in the WEMO Project. Many commenters requested the range of alternatives include an alternative that maximizes motorized recreation as well as one that minimizes motorized travel to only that needed in a region. Some commenters noted mileage should be limited or reduced to protect sensitive resources or special designations. Comments indicated alternatives should include multiple route designation scenarios with different route designs in each scenario. Other recommended alternatives included converting existing or closed roads to OHV routes; maintaining access to historic sites, dispersed campsites and trailheads; beginner, intermediate and advanced routes for all motorized users; shared use trails; and building new trails, loops and 4X4 challenge routes. One commenter requested the BLM consider an alternative that maximizes the potential for recovery of Threatened and Endangered species.

Several commenters emphasized the importance of no reduction or loss of motorized opportunities and the need for equal quantity and quality of motorized and non-motorized opportunities. One commenter requested more single track routes while another commenter requested motorcycle or single track routes be specifically defined including how they will be maintained and managed.

Category #10 – Data and Route Inventory

Comments in this category primarily addressed the types of data, data sources, references, maps, and route inventory the BLM should consider during the WEMO Project. Commenters requested various sources of information be included in the baseline inventory for evaluation including data and analysis from previous planning efforts, published sources and maps, BLM GIS data on collecting areas (e.g., rocks, gem, minerals and fossils), inventory of water sources (seeps, springs, tinajas, guzzlers, tanks, and wells), previously disturbed sites, vegetation mapping, and wildlife linkage maps and studies. Several comments suggested compiling the baseline network data from 1980 and pre-1980 maps, then comparing this data with current network data. Commenters also identified ground-truthing to be critical to the development of an accurate route inventory. The general theme of the comments was the importance of developing a complete picture of the existing conditions of the WEMO route network.

Commenters recommended compiling the route network and resource data in GIS format for evaluation and suggested data and methodologies for the evaluation. Commenters requested the BLM consider natural resource data, scientific information related to motorized vehicle use impacts, and motorized use statistics including data on accidents and enforcement. Some commenters also requested the BLM gather and analyze data on closed routes in addition to routes currently designated as open.

The need for better maps was a common sentiment expressed by commenters who pointed out numerous inaccuracies, poor labeling, inadequate scale, and lack of detail as some of the problems with the maps of the WEMO route network. Commenters pointed out details such as railroads, populated areas, and campgrounds which were not shown and others which were not labeled. Several commenters noted they knew of routes not shown on the maps or not properly labeled as open or closed. Commenters suggested displaying topographic features, jurisdictional boundaries, water sources, township and range coordinates, and distinguishing between types of routes using different colors (e.g., single track versus two track routes). In addition to improving the maps, commenters requested the BLM make mapping products, including static maps and GIS data, more readily available by posting on the BLM website.

Category #11 – Analysis and Impacts

The BLM received multiple comments regarding the need for analysis, using the best available science, of potential impacts from the route designation process and resulting travel management amendment on other resources and resource uses. Commenters expressed concern or requested analysis regarding impacts to the following:

- Air Quality – analyze air quality impacts from construction and maintenance of roads and off-road routes as well as regional and local air quality impacts.
- Biological Resources – analyze the impacts to BLM sensitive, rare, threatened, and endangered species and their habitats, including desert tortoise.
- Climate Change – analyze impacts to and from climate change on route designation (one commenter disputed the validity of climate change impacts).
- Cumulative – analyze cumulative impacts from past, present and future actions including, but not limited to proposed or anticipated alternative energy projects, military base expansions (U.S. Marine Corps Air Ground Combat Center Twentynine Palms), other planning efforts such as the

Solar Programmatic EIS and Desert Renewable Energy Conservation Plan, and the cumulative impacts of motorized closures.

- Minerals – analyze impacts to mineral resource extraction and associated economic impacts from restricted access.
- Recreation – analyze the effects of route designation on all types of recreation that occur in the planning area, including non-motorized recreation.
- Socioeconomic – analyze impacts from the project on the social and economic conditions of local and regional communities.
- Soil – analyze acreage of land subjected to low, moderate and high vehicle use disturbance in relation to differing erosion rates.
- Special Designations and Other Management Areas – analyze impacts to special designations and other management areas including national parks, wilderness areas, and ACECs.
- Visual – analyze lands subjected to visual resource impacts due to route location on certain topography, or the likelihood of erosion impacts over time.
- Water – analyze impacts to riparian areas, wetlands, springs, seeps, and other water dependent resources.

Commenters also requested the BLM consider a variety of route-specific factors when analyzing each route during the designation process such as if the route is a through-road, the history of the road, and proximity to guzzlers, tank wells, springs, seeps, or tinajas.

Category #12 – Mitigation and Minimization

Comments in this category primarily addressed how the BLM should mitigate for the loss of routes and mitigate or minimize the impacts from motorized vehicle use on other resources. Several commenters recommended the BLM treat the closure of off-road routes, and resulting loss of access to unique locations for recreational opportunities, as an adverse impact that would necessitate mitigation in the form of designating new routes, opening currently closed routes in areas that would receive the least impact from off-road travel or leaving existing routes open to off-road travel. One commenter stated that mitigation for route designation should be the responsibility of the BLM not other stakeholders, and mitigation should not affect other uses. Another commenter requested the BLM mitigate for the loss of off-road access due to renewable energy and military projects. If the loss of off-road routes cannot be mitigated within the planning area, one commenter advised that a Motorized Access and Recreation Mitigation Bank be established to account for the number of miles closed through the WEMO route designation process.

Other commenters requested the BLM mitigate impacts to other resource values from motorized vehicle travel. Commenters emphasized that redundant routes should be identified and evaluated in an effort to minimize the number of open routes. Several commenters reminded the BLM that they must consider the minimization criteria specified in 43 CFR 8342, reiterating that routes designated as open must still minimize impacts to the natural or cultural resources, air and water quality, scenic values, and non-motorized uses of public lands or adjacent and interspersed private lands. For example, a commenter suggested that the total number of routes in high-relief topography be limited.

Category #13 – Implementation and Administrative Actions

The BLM received the most comments within this category which primarily addressed how the BLM should handle implementation-level decisions including route signage, trail monitoring, enforcement, public education, trail enhancements, and other administrative actions. Improving signage was a common refrain

expressed by commenters, although the recommended methods to do so varied. Some commenters requested the BLM sign all routes as open or closed, while other commenters requested signing only closed routes, only open routes, and variations thereof. Commenters also expressed concern about sign vandalism and indicated areas where the BLM should not erect signs for resource protection. Commenters requested the BLM include specific information on signs and kiosks such as route use limitations, explanations for closure or rehabilitation, historical and cultural information, descriptions and significance of riparian areas for wildlife, skill level needed for travel, directional arrows, route numbers, and information regarding penalties associated with non-compliance for off-road travel restrictions.

Several commenters cited the need for a specific monitoring plan within the WEMO Plan to gather information about impacts to routes to better manage and enforce route designations, comply with route restrictions, and implement rehabilitation efforts. Commenters also noted that rehabilitation of closed routes has generally not been successful in keeping OHVs from using the routes and suggested various ways in which the BLM could improve rehabilitation. For example, one commenter proposed that the “Youth in Nature” program could partially fund rehabilitation efforts, while another commenter recommended that prioritizing rehabilitation areas would be a more efficient use of BLM staff and funding.

Commenters recommended addressing enforcement of route designations and restrictions as a way to improve management of off-road use and impacts and provided suggestions for enforcement strategies (e.g., improved collaboration with city and county law enforcement and improved reporting systems). One commenter also suggested speed limits for limited use areas be lower than non-limited areas. Another commenter suggested issuing an administrative permit to allow access to mining claims that are inaccessible due to road closures. Commenters indicated the BLM needs a public education program to educate trail users on BLM travel management regulations in an effort to further involve the public. The public education program could create avenues in which members of the public can volunteer to assist the BLM in managing off-road routes and commenters suggested different ways an education program could be paid for and implemented. Commenters also suggested coordinating with the U.S. Forest Service on implementation efforts along the boundary of the San Bernardino National Forest and BLM-administered land.

Route-Specific Designation

Category #14 – Travel Management Area 1 (Broadwell Lake, Afton Canyon, and East of Barstow signing sub-regions)

Site-specific comments submitted on TMA 1 addressed issues of access, recreation, visual and cultural resources, paleontological study and education, and protection of wildlife habitat. Most commenters requested access to specific areas like Southern Cady Mountains, Afton Canyon, and Broadwell Lake. Many commenters cited areas in TMA 1 as being excellent areas for “rockhounding” and some noted that access to certain scenic and other recreational sites was not feasible without motorized vehicle routes. Some site-specific comments and requests regarding TMA 1 included:

- Maintain and open additional routes in Afton Canyon and Broadwell Lake subregions to allow for study of important paleontological resources.
- Maintain access across TMA 1 for seniors and disabled persons.

Category #15 – Travel Management Area 2 (Sierras, Darwin, and North and South Searles signing sub-regions)

Site-specific comments submitted on TMA 2 addressed issues of access, recreation, education, and protection of other resource values. Commenters raised issues regarding the impact of routes in TMA 2 on air quality, soils, watershed, vegetation, air, cultural resources, and wildlife. Some commenters specifically requested the BLM mitigate impacts to air quality near the town of Darwin. Several commenters raised concerns about the safety of specific routes in TMA 2 and asked the BLM improve routes to provide safer use, including recommending locations for OHV staging areas. Commenters noted TMA 2 is a favorite location for “rockhounding” and other recreational activities, and commenters provided extensive documentation supporting their rationale for maintaining certain routes as open. Some site-specific comments and requests regarding TMA 2 included:

- Retain access to historical mine sites in the Owens Valley for educational excursions.
- Provide alternative routes to the town of Darwin in case of emergency.
- Provide access to the town of Darwin’s water pipeline.
- Provide access to a microwave relay station near the town of Darwin.
- Designate a staging area outside of the inhabited portions of the town of Darwin.
- Maintain single-track system across TMA 2.

Category #16 – Travel Management Area 3 (Juniper, Rattlesnake, Morongo, Wonder Valley, and Joshua Tree signing sub-regions)

Site-specific comments submitted on TMA 3 addressed issues of access, recreation, trespass, safety, farming and ranching, mining claim access, paleontological study, routes near wilderness areas and national parks, and protection of other resource values. Many commenters raised issues regarding the impact of routes within TMA 3 on air quality, soils, watershed, vegetation, air, cultural resources, and wildlife. Commenters specifically noted that OHV use has been shown to be detrimental to special status plants and wildlife in TMA 3. Additionally, commenters voiced concerns regarding the presence of routes within wilderness areas and intersections with county maintained roads near residential communities, specifically near the Wonder Valley community. Many commenters noted deterioration in the quality of life as a result of increased OHV use. One commenter encouraged the BLM to view the route designation process as an opportunity to address resource concerns and alleviate pressure on sensitive areas in TMA 3. Another commenter requested clarification regarding closures near the Bighorn Mountain Wilderness Area and Viscera Springs. Commenters referenced the lack of signage designating areas as open or closed and a few commenters recommended signage to help riders delineate between BLM-administered land and private property and include speed limits. Several commenters were concerned about the noise created by OHVs. Commenters voiced support or opposition for maintaining specific routes in TMA 3 and many provided rationale for their opinions such as access to mining claims, safety, and conflict with livestock. Some site-specific comments and requests regarding TMA 3 included:

- Permanently close routes in the Morongo Basin adjacent to private property and in fragile habitat.
- Remove off-road vehicle routes near Cleghorn Lakes and Sheephole Wilderness Areas and near Joshua Tree National Park.
- Address “encampments” of off-roaders near Joshua Tree National Park on Old Dale Road.
- Close neighborhood routes in the Wonder Valley for reasons of safety and quality of life.

- Retain access to sites of paleontological importance in Juniper Flats subregion.
- Address illegal motorized vehicle use in Juniper Flats subregion.

Category #17 – Travel Management Area 4 (Jawbone, Middle Knob and Lancaster signing sub-regions)

Site-specific comments submitted on TMA 4 addressed issues of access, recreation, cultural resources, safety, illegal access and trespass, and protection of sensitive wildlife habitat. Several commenters supplied supporting information for a trail system in the Jawbone subregion known as the Jawbone Canyon Store Trail System. Support for the Jawbone Canyon Store Trail System was a common sentiment expressed by other commenters. Additionally, several commenters requested access to currently closed areas as well as general requests to increase the number of trails available. Some commenters expressed concern about fenced trails that funneled all users onto the same trails and resulted in unsafe conditions. Other commenters wanted areas designated for specific types of OHV use only. Some site-specific comments and requests regarding TMA 4 included:

- Increase single-track in Jawbone.
- Close unauthorized trails along Kelso Valley Road, Piute Mountain Road, and St. John's Ridge.
- Open Butterbrecht Peak area to more vehicle access.
- Address unauthorized access in the Middle Knob subregion, specifically near the Tehachapi Mountains to protect sensitive cultural resources.
- Reopen the St. John's Ridge trail.
- Close raptor habitat in the Jawbone-Butterbrecht AEC to motorized vehicle travel.
- Address unauthorized access in the Burring Moscow Spring drainage.
- Protect the Pacific Crest Trail from damage from motorized vehicle use.

Category #18 – Travel Management Area 5 (WEMO North Barstow Desert Wildlife Management Area signing sub-region north of Interstate-15 and State Route 58)

Site-specific comments submitted for TMA 5 addressed issues of access, trespass, recreation, gem and mineral collection, paleontological study, and protection of wildlife habitat. The majority of commenters advocated for opening specific routes for rock-collecting, mining claim access, paleontological study, and OHV use, primarily in the Cronese Lake subregion. One commenter requested closing a route due to nearby sensitive species. Some site-specific comments and requests regarding TMA 5 included:

- Address parking near Soda Mountain.
- Maintain access to Mud Hills in the Coolgardie subregion for paleontological and geological study.
- Address unauthorized vehicle use to protect wildlife habitat in Coolgardie Mesa and north of the Minneola Road exit from Interstate-15.
- Protect the Pacific Crest Trail from damage from motorized vehicle use.

Category #19 – Travel Management Area 6 (Mirage (including Edwards Bowl area), Fremont, and Iron Mountain signing sub-regions south of State Route 58)

Site-specific comments submitted on TMA 6 addressed issues of access, trespass, unauthorized use, recreation, and protection of sensitive wildlife and plant species. Some comments alluded generally to the impacts of uncontrolled vehicle use on plant and wildlife populations in TMA 6, while others specifically noted that vehicle staging and camping in the Fremont Subregion and specifically in Edwards Bowl posed potential risk to Barstow woolly sunflower, desert tortoise, and Mojave ground squirrel, and presented a

nuisance to surrounding residents. One commenter expressed concern that routes on BLM-administered land near their property could result in inadvertent trespass and have a detrimental impact on the property's resource values. Another commenter expressed concern about unauthorized use occurring near the historic Mojave Trail. Some site-specific comments and requests regarding TMA 6 included:

- Manage Fremont Peak and Gravel Hills for recreation.
- Manage certain routes in Iron Mountain for motorcycles and certain routes for dual sports events.
- Clarify status of certain routes in Kramer Hills regarding motorcycle use and dual sports event.
- Address unauthorized travel in Point of Rocks.
- Address unauthorized travel in Mojave Fishhook Cactus ACEC.

Category #20 – Travel Management Area 7 (Ridgecrest, El Paso, Rands and Red Mtn signing sub-regions)

Site-specific comments submitted on TMA 7 addressed issues of route closure and openings, access, recreation, dual sports events, visual and cultural resources, and protection of sensitive wildlife and plant species. Commenters identified by name or number routes or locations they wanted to see maintained, opened, extended or closed for reasons such as for safety, wildlife viewing, and access to “rockhounding” sites and mining claims. Several commenters expressed strong support for more roads and greater vehicle access across TMA 7 for recreational purposes, including providing vehicle support for equestrian backcountry trips, access to recreational areas for seniors, access to gem and mineral collecting sites, and access to public gathering sites. Some commenters expressed concern regarding proliferation of routes in TMA 7 and the resultant impacts to scenic viewpoints and desert tortoise habitat, while others indicated they wanted to maintain access to scenic areas and cultural sites. Commenters noted the types and characteristics of trails were important considerations and commenters requested more single-track or the re-routing of trails to provide different levels of difficulty. Some of the site-specific comments and requests regarding TMA 7 included:

- Designate the El Paso subregion as a Special Management OHV Area with all trails managed as open.
- Expand the Spangler area to include ‘C’ routes.
- Re-open routes in Rand Mountains.
- Maintain the former West Rands ACEC as closed to motorized use.
- Maintain route access in El Paso zones 34 and 35 for target shooting and hunting.
- Develop and manage single-track system.
- Provide access to routes in West Rands by permit only.

Category #21 – Travel Management Area 8 (Lands adjacent to Stoddard and Johnson OHV areas, and other signing sub-regions south of Interstate-40 and north of State Route 247 including east of Interstate-15)

Site-specific comments submitted for TMA 8 addressed issues of access, recreation, competitive racing, and gem and mineral collection. Commenters mainly addressed specific routes they would like to remain open for OHV use, rock-collecting, and mining claim access, specifically in the Stoddard Wells-Black Mountain, Talc Mine, and Lavic areas. One commenter expressed concern that the Ord Mountain region was experiencing high levels of illegal use, and another commenter indicated he was concerned about the

expansion of military land into Johnson Valley. Some of the site-specific comments and requests regarding TMA 8 included:

- Designate Camprock Road under RS 2477.
- Increase enforcement in Ord Mountain region.
- Obtain easements from private property owners to connect routes.
- Connect Stoddard Valley Open Area with open areas of Johnson Valley.

3.3.3 Summary of Out of Scope Comments

In addition to the comments described above, the BLM received scoping comments that were outside the scope of analysis for the WEMO Project. Out of scope comments included comments regarding internal BLM operations, comments associated with decisions and actions that will not be made in the WEMO Project EIS, and other comments that are not within the scope of analysis for the WEMO Project EIS.

Many commenters asked the BLM to extend or include additional opportunities for public comments. Some commenters raised issues with BLM staffing, noting that staff turnover, specifically of field managers in the Ridgecrest and Barstow field offices, and the lack of staff that are knowledgeable about travel management issues and FLPMA and NEPA generally, was a detriment to the WEMO Project. One commenter specifically requested BLM staff be licensed and trained to operate OHVs and spend time riding with the OHV community to better understand their needs, and another commenter expressed concern with how BLM staff was upholding the California Desert Protection Act.

A few commenters voiced concerns regarding the BLM's budget and whether it will be adequate to complete and enforce the route designations. Other comments questioned how the BLM could complete the project on a condensed timeline when the original project took 15 years.

Some commenters requested decisions on actions outside the BLM's authority including a congressional proposal to restrict access in portions of the Mojave Desert, and the creation or removal of wilderness areas. Other comments requested the BLM address decisions outside the scope of the WEMO Project EIS, including managing target shooting, controlling burro populations, and addressing safety concerns associated with abandoned mine lands.

4.0 ISSUES IDENTIFIED DURING SCOPING

Based on the comments submitted during scoping and summarized above, the BLM developed 18 issue statements, in the form of questions, which describe the general issues and concerns identified during scoping. This section also includes specific questions and concerns encapsulated within each issue statement, displayed in bullet-point format beneath each issue statement. Issue statements are organized by comment category (e.g., Route Designation Process) although the relationship between comment category and issue statement is not necessarily one to one – a comment category may have none, one or multiple issue statements based on the broad concerns raised by commenters. Because general or network wide and site-specific route designation comments raised the same issues (the latter raising issues by location rather than generally), issue statements appear only under the General and Network Wide Route Designation categories.

The BLM will continue to consider issues during the WEMO Project as it receives additional input from the public, Cooperating Agencies, Tribes, the DAC, and other affected parties.

National Environmental Policy Act Process

Issue: How will BLM define the scope of the WEMO Project and effectively engage the public and stakeholders in the process?

Livestock Grazing

Issue: How will the WEMO Project address livestock grazing impacts?

- What are the site-specific and cumulative impacts of livestock grazing?
- How will the BLM analyze and mitigate the impacts from livestock grazing on resources and resource uses?

Route Designation Process

Issue: How will the BLM designate and evaluate routes in the WEMO Plan considering other travel management processes and plans?

- Will the WEMO Project incorporate the CAPA process?
- How will the route designation process comply with the court mandates and relevant federal, state, and local policies, regulations, and land use plans?
- How will the BLM manage and maintain the route network?
- How can the BLM maintain connectivity with other planning areas?
- What options to closing routes are available if the BLM identifies conflicts with 43 CFR 8342.1?

Issue: Will the BLM designate and evaluate routes using the subregion or regional approach?

- Will the BLM analyze motor vehicle use separately or combined with subregion route designation?

General and Network Wide Route Designation

43 CFR 8342.1(a) – Route Designation Criterion A

Issue: How will the BLM comply with route designation Criterion A (43 CFR 8342.1[a]) to minimize damage to air, soil, watershed, vegetation and other resources?

- Consider impacts to special status plant species.
- What methods or actions can improve air quality in the planning area and minimize potential effects on human health?
- Use the Visual Resource Management system to evaluate and minimize impacts on visual resources.
- Utilize soil erosion potential ratings and other tools to identify areas or routes to be avoided, closed, or rehabilitated to minimize impacts on soils.

43 CFR 8342.1(b) – Route Designation Criterion B

Issue: How will the BLM comply with route designation Criterion B (43 CFR 8342.1[b]) to minimize harassment to wildlife or significant disruption of wildlife habitats?

- Minimize effects of motorized and non-motorized recreation on wildlife, including special status species and their habitats in the planning area.
- What management actions and other strategies can minimize habitat fragmentation in and around the WEMO Project planning area?
- Avoid designating routes in critical habitat, riparian areas, and other sensitive habitats.

43 CFR 8342.1(c) – Route Designation Criterion C

Issue: How will the BLM comply with route designation Criterion C (43 CFR 8342.1[c]) to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas?

- Identify areas and trails to be designated for non-motorized recreation.
- Identify areas and routes to be designated for specific types of motorized use (e.g., motorcycle only versus quad trails, touring versus staging areas, etc.).
- How will route designation and travel management minimize effects of motorized recreation on the surrounding community and adjacent landowners?
- Identify routes or areas for closure to reduce conflicts with adjacent landowners.
- Minimize effects of OHV events on the surrounding community.
- How can the BLM improve enforcement and compliance with rules, regulations and policies for motorized recreation?
- What measures can reduce effects of noise and dust on the surrounding community and adjacent landowners?

43 CFR 8342.1(d) – Route Designation Criterion D

Issue: How will the BLM comply with route designation Criterion D (43 CFR 8342.1[d]) to prohibit trails in officially designated wilderness areas or primitive areas?

- Comply with policies, regulations and laws related to wilderness areas.
- Identify routes to be closed or use limited near or within wilderness areas, primitive areas, and areas where sensitive resources occur.
- What methods and tools can the BLM implement to protect wilderness and sensitive resources?

Network Purpose or Need

Issue: How will travel management and route designation meet and balance the needs of public land interests?

- How can the WEMO Plan balance designating routes while enhancing recreation opportunities in the planning area?
- How can the BLM maintain access for all users including seniors or disabled persons?
- How many new trails and types of opportunities can the WEMO planning area accommodate?
- How many and which trails will be opened, closed or use limited to minimize impacts (recreation and resource) while maintaining safety?

Range of Alternatives

Issue: How will the BLM develop reasonable alternatives representing a range of travel management opportunities that meet the purpose and need?

- Consider a range of alternatives including an alternative that maximizes the route network and one that maximizes resource protection.
- What mix of motorized and non-motorized opportunities best meets the purpose and need of the route designation process?
- How many different network scenarios can the BLM formulate?
- What components in each scenario (types of opportunities, destinations) are important to address both motorized and non-motorized recreation?

Data and Route Inventory

Issue: How will the BLM compile appropriate data and baseline information to inform the route designation process, guide the impact analysis, and engage the public?

- Consider existing data sources applicable to recreation and natural resources, including rock, gem, mineral and fossil collecting sites, other planning efforts underway in the region, and wildlife linkage studies and maps.
- Use up-to-date scientific information on resources and potential impacts of recreation.
- Identify appropriate methods and data needed.
- Consider using information from previously published maps, surveys, and designation efforts.
- Engage and utilize public and stakeholder knowledge of the planning area.
- Use mapping products to effectively inform the public.

- Identify and implement methods to verify routes including collaborating with public and stakeholders.
- What level of detail is needed to inform the public so they can effectively comment on the route network?
- Consider ways to make maps and data more readily available to the public.

Analysis and Impacts

Issue: How will the BLM analyze and consider the range of potential impacts to resources and resource uses from route designation in the planning area?

- Consider route-specific factors when analyzing the route network.
- Analyze both local and regional impacts to air quality from motorized vehicle use and construction and maintenance of routes.
- Analyze impacts to mineral resource extraction and related socioeconomic impacts from route minimization.
- Analyze the impacts to BLM sensitive, rare, threatened and endangered species and their habitats.
- Analyze how climate change would affect the proposed WEMO Project and how the WEMO Project would affect climate change.
- Analyze how route designation will affect motorized and non-motorized recreation.
- Analyze impacts from the WEMO Project on the social and economic conditions of local and regional communities.
- Analyze impacts to soil, including effects on erosion, from motorized vehicle use.
- Analyze impacts to special designations and other management areas including ACECs, national parks, and wilderness areas.
- Analyze impacts to visual resources from route designation and motorized vehicle use in the short and long term.
- Analyze impacts to riparian areas, wetlands, springs, seeps and other water dependent resources.

Issue: How will the WEMO Project address cumulative impacts associated with past, present, and reasonably foreseeable development in the region?

- What past, present, and reasonably foreseeable projects and their connected actions would be appropriate to include in the cumulative impacts analysis?
- Consider the cumulative impact of road closures.
- How will the expansion of the U.S. Marine Corps Air Ground Combat Center Twentynine Palms affect the route network in the planning area, and how will the BLM address impacts?

Mitigation and Minimization

Issue: How will the BLM mitigate the loss of access from road closures?

- Should the BLM establish a mitigation bank or use other methods to account for the loss of road or trail mileage through the route designation process?
- How will the BLM mitigate road closures in a manner that has the least impact on other uses?
- Mitigate for the loss of off-road access due to renewable energy, military projects, and other projects that occur in the planning area.

Issue: How should the WEMO Project mitigate or minimize the impacts to other resource values from motorized vehicle travel?

- Routes designated as open should minimize impacts to natural and cultural resources, air and water quality, scenic values, and non-motorized uses of public lands or adjacent or interspersed private lands.
- Identify and remove redundant routes.
- Consider the minimization criteria specified in 43 CFR 8342.
- Limit the number of routes in sensitive areas.

Implementation and Administrative Actions**Issue: How will the BLM use signage to identify designations and reduce the potential for conflict?**

- Which route designations will receive signs (closed, open, limited, or a combination thereof)?
- What information will the BLM post on signs and kiosks to inform and educate trail users?
- Should the BLM post route signs near sensitive resources at the risk of bringing attention to the resources?
- What measures should the BLM implement related to signage to improve user safety?
- How will the BLM address vandalism of signs and kiosks?

Issue: How will the WEMO Plan address monitoring and rehabilitation of the WEMO route network?

- Consider a monitoring plan.
- Consider establishing a threshold that identifies a level of unacceptable impact.
- How can the BLM increase the efficiency of rehabilitating closed routes and reduce unauthorized travel on closed routes?

Issue: How will the BLM educate the public on the revised route designations and enforce BLM travel management rules and regulations?

- What methods can the BLM use to improve enforcement of route designations and restrictions?
 - Improve collection of enforcement violation data.
- What types of outreach programs will be most effective for educating trail users and reducing the number of violations?
- Consider volunteers to help manage and maintain the route network.

5.0 SUMMARY OF FUTURE STEPS IN THE PROCESS

Now that scoping is complete, the BLM will develop a reasonable range of alternatives that address the issues identified during scoping and complete travel management plans for each of the eight TMAs. The alternatives will offer distinctive choices among travel management strategies and provide management direction for the eight travel management plans. The BLM will analyze each of the alternatives in the EIS to assess the environmental impacts of the alternatives.

The next formal opportunity for public comment will be when the BLM releases the Draft EIS, anticipated June 2013. The BLM will continue to accept and consider all public input throughout the WEMO Project process. Additionally, the BLM will continue to coordinate with Cooperating Agencies, Tribes, the DAC, and other interested parties during the WEMO Project development process.

The BLM will publish a Notice of Availability (NOA) for the Draft EIS in the Federal Register announcing availability of the Draft EIS for review and comment. Publication of the NOA for the Draft EIS will initiate a public comment period during which the BLM will invite the public and other interested parties to provide comments on the Draft EIS. The BLM will hold public meetings during the public comment period and will advertise the meetings through mailings to contacts on the project mailing list and through other notification methods. The BLM will review and consider all comments received on the Draft EIS during the public comment period. The BLM will revise the Draft EIS as appropriate based on public comments, and will incorporate all substantive comments and responses into the Final EIS. The BLM will publish an NOA for the Final EIS in the Federal Register announcing the availability of the Final EIS. The BLM anticipates releasing the Final EIS in November 2013.

Following the release of the Final EIS, the BLM will prepare a ROD, documenting the selected alternative. The BLM anticipates publishing the ROD in January 2014.

In the near term, the BLM is preparing and posting on the WEMO Project website baseline data depicting the current route network for each of the TMAs in the planning area. The BLM anticipates posting data for all TMAs by mid-July 2012.